

June 2, 1975

Mr. John Goodson
Wayne Manufacturing, Inc.
126 North Louisa
Shawnee, OK 74801

Dear Mr. Goodson:

This responds to your letter of March 27, 1975, in which you requested comments on the regulations as they apply to a service riser to be used on a plastic gas service.

The drawings enclosed with your letter showing the proposed service riser indicate a polyethylene gas pipe encased in a galvanized steel tubing to a point at the intended ground level where a transition is made from plastic to metal inside the casing.

The plastic pipe and the metallic piping intended to contain gas must meet the material requirements of Subpart B of Part 192. The galvanized steel casing is not considered as a segment of a pipeline and would therefore not be required to comply with Part 192. There are two other particular points of concern with an encased plastic service riser and the safety requirements of Part 192. The temperature limitations of Section 192.123(b) do not permit plastic pipe to be used at operating temperatures below minus 20°F, or above 100°F for thermoplastic pipe, or above 150°F for reinforced thermosetting plastic pipe. Section 192.455 requires each buried or submerged (metallic) pipeline installed after July 31, 1971, to be protected against external corrosion unless an operator can demonstrate by tests, investigation, or experience that a corrosive environment does not exist. If a given service riser is installed to comply with these requirements and other appropriate requirements of Part 192, it would be acceptable. If there is no buried metallic pipe, then no cathodic protection is required. The operator must also assure that plastic gas piping is not operated at temperatures beyond the limits set forth in Section 192.123(b).

Thank you for your interest in pipeline safety.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety

WAYNE MANUFACTURING, INC.

126 NORTH LOUISA
SHAWNEE, OKLAHOMA 74801

March 27, 1975

Mr. J. C. Caldwell
Dir. Office of Pipeline Safety
400 7th Street S.W.
Washington, D.C. 20590

Dear Mr. Caldwell:

I was talking with your Mr. Fulton concerning [sic] approval of OK of a non-corrodible service riser and he advised me that you did not endorse any products, but could interpret the regulations.

I am enclosing a print of our product to get your comments. We showed this fitting to your people in Houston and they felt it was fine.

Please advise if you need further data.

Sincerely,

\signed\

John Goodson

Attachments